

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CHASE WILLIAMS AND WILLIAM  
ZHANG, individually and on behalf of all  
others similarly situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER, and  
DANIEL LARIMER,

Defendants.

Civ. No. 1:20-cv-2809-LAK

CLASS ACTION

CRYPTO ASSETS OPPORTUNITY FUND  
LLC and JOHNNY HONG, Individually and  
on Behalf of All Others Similarly Situated,

Plaintiffs,

v.

BLOCK.ONE, BRENDAN BLUMER,  
DANIEL LARIMER, IAN GRIGG, and  
BROCK PIERCE,

Defendants.

Civ. No.: 1:20-cv-3829-LAK

CLASS ACTION

**SUPPLEMENTAL DECLARATION OF JOSEPH MAHAN IN SUPPORT OF LEAD  
PLAINTIFF'S MOTION FOR FINAL APPROVAL OF SETTLEMENT**

I, Joseph Mahan, declare and state as follows:

1. I am a Settlement Project Manager employed by Epiq Class Action & Claims Solutions, Inc. (“Epiq”) located at 777 Third Avenue, New York, NY 10017. The following statements are based on my personal knowledge and information provided to me by other Epiq employees and if called to testify I could and would do so competently.

2. Pursuant to the Court’s Order Granting Lead Plaintiffs’ Unopposed Motion to Approve Form and Manner of Giving Notice of Proposed Settlement to the Proposed Class, dated June 23, 2021 (ECF No. 115) (the “Notice Order”), Epiq was appointed to supervise and administer the notice procedure as well as the processing of claims in connection with the proposed Settlement of the above-captioned action (the “Action”).<sup>1</sup> I oversaw the notice services that Epiq provided in accordance with the Notice Order.

3. I submit this declaration in order to provide the Court and the parties to the Action with information regarding: (1) the number of hits to the Settlement website and (2) the number of requests for exclusion from the Class received to date by Epiq.

4. As described in the Declaration of Joseph Mahan Regarding (A) Media Campaign and Claims Package Dissemination; (B) Publication of the Summary Notice; and (C) Report of Requests for Exclusion Received to Date (ECF No. 119-1), Epiq established and continues to maintain a website dedicated solely to this settlement ([www.blockone-settlement.com](http://www.blockone-settlement.com)) (“Settlement Website”) to inform class members about the settlement and provide answers to frequently asked questions. Copies of the Notice, Proof of Claim, Stipulation, and Notice Order are posted on the website and are available for downloading. Class Members can also complete

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<sup>1</sup> All capitalized terms that are not otherwise defined herein shall have the same meanings provided in the Stipulation of Settlement dated June 11, 2021 (the “Stipulation”).

and submit a Proof of Claim through the Settlement Website, which contains fillable forms with electronic signature capability.

5. To date, the Settlement Website has received 114,011 hits. In my experience, this is a high rate of hits to the Settlement Website and demonstrates that the media campaigns designed to facilitate the publication and dissemination of the Notice were successful in driving interested parties to the Settlement Website.

6. The Notice informs potential Class Members that requests for exclusion must be sent by First Class Mail to EXCLUSIONS, *Block.one Settlement* c/o Epiq, P.O. Box 4808, Portland, OR 97208-4808, such that they are postmarked no later than October 27, 2021. Alternatively, requests for exclusion can be emailed to [info@blockone-settlement.com](mailto:info@blockone-settlement.com).

7. Epiq has monitored and will continue to monitor all mail and email delivered to the above physical address and email address. As of the date of this declaration, Epiq has received no objections or requests for exclusion.

I declare under penalty of perjury that the foregoing is true and correct, and that this declaration was executed this 29th day of October, 2021, at Philadelphia, Pennsylvania.



Joseph Mahan